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ELECTRONICALLY FILED
DOC #:
DATE FILED: 53 09

February 27, 2009

VIA FACSIMILE

Hon. Barbara S. Jones United States District Judge Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, NY 10007-1312

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Re: Leslie Dick Worldwide, Ltd. et al. v. George Soros, et al., Case No. 08 Civ. 7900

Dear Judge Jones:

As counsel for the Soros Defendants, we write to report an agreement between plaintiffs and the defendants named in the Amended RICO Complaint ("complaint") filed earlier this week in the above matter regarding a briefing schedule for motions to dismiss the complaint. As with the original complaint, defendants would submit one brief addressing common issues and individual defendants would submit shorter briefs covering issues particular to them. The parties have agreed on the following schedule for the filing and briefing of motions to dismiss:

April 24: Defendants' motions to dismiss

July 20: Plaintiffs' oppositions Aug. 17: Defendants' replies.²

The parties have further agreed that any Rule 11 notices/letters concerning the complaint, together with the proposed brief ("Notices"), would be served on plaintiffs' counsel no later than July 10, 2009 and that, regardless of any earlier service of such Notices, plaintiffs' 21-day safe harbor period would that commence to run until July 10, 2009 and would end on July 31, 2009.

Defendant Donald J. Trump, represented by the Phillips Nizer firm, is not part of this agreement to higher of Magistrate Judge Katz' Order staying Trump's motion to dismiss the complaint pending resolution of plaintiffs' motion for disqualification of the Phillips Nizer firm.

Plaintiffs' counsel anticipates shortly filing a Corrected Amended RICO Complaint to correct certain typographical and other non-substantive matters. We do not anticipate this will affect the foregoing self-class.

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We have not previously made any scheduling requests in connection with the responses to this complaint, which otherwise would have been due on March 9, 2009, or in connection with any future Rule 11 Notices.

We hope that this schedule is acceptable to the Court.

Respectfully submitted,

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Willkie Fart & Gallagher LLP

Benito Romano

Freshfields Bruckhaus Deringer US LLP

Counsel for Defendants

George Soros and Soros Fund Management LLC

cc: Magistrate Judge Theodore H. Katz (by fax)

David H. Relkin, Esq. (via email)
All Defense Counsel (via email)

The Court approves this agree

SO ONDERED_

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